



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221

RECEIVED

JUN 25 2014

June 13, 2013

Mr. John E. Kieling, Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505-6303

NMED
 Hazardous Waste Bureau

Subject: Transmittal of the Audit Plan and Notification of Assigned Auditors for CBFO Recertification Audit A-14-19, LANL/CCP TRU Waste Characterization Activities

Dear Mr. Kieling:

This letter transmits the audit plan, Audit Number A-14-19, for Carlsbad Field Office (CBFO) Recertification Audit A-14-19 of the Los Alamos National Laboratory (LANL) Central Characterization Program (CCP) contact-handled transuranic (TRU) waste characterization activities. The audit is required by the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP). It will be conducted in accordance with the enclosed CBFO Audit Plan, Audit Number A-14-19, and will be held at the LANL facilities in Los Alamos, New Mexico and at the Skeen-Whitlock Building in Carlsbad, New Mexico on July 15-17, 2014. The audit plan identifies the audit team members as required by the HWFP.

Based upon conversations with LANL/CCP personnel, the audit team is planning to observe characterization field activities; however, this may be subject to change due to the Accident Investigation Board's (AIB) ongoing investigation and evaluation.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning Audit Number A-14-19, please contact Mr. Michael R. Brown, Director, CBFO Office of Quality Assurance, at (575) 234-7476.

Sincerely,

Jose R. Franco, Manager
 Carlsbad Field Office

Enclosure

cc: w/enclosure

S. Ross, EM-43 *ED
 R. Toro, EM-43 ED
 D. Bryson, CBFO ED
 M. Brown, CBFO ED
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 J.R. Stroble, CBFO ED
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 CBFO QA File
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CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-14-19

Organization to be Audited: Los Alamos National Laboratory (LANL) Central Characterization Project (CCP)
Nuclear Waste Partnership LLC (NWP)

Organizations to be Notified: NWP/CCP
U.S. Department of Energy, Los Alamos Field Office (DOE/LAFO)
U.S. Environmental Protection Agency (EPA)
New Mexico Environment Department (NMED)

Date and Location: July 15 – 17, 2014
Los Alamos, New Mexico

Audit Team:

Michael R. Brown	CBFO Office of Quality Assurance, Director
Dennis Miehl	CBFO Office of Quality Assurance, Audit Team Management Representative
Berry Pace	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Cindi Castillo	Auditor, CTAC (RTR)
Katie Martin*	Auditor, CTAC (C6 QA)
Jim Schuetz*	Auditor, CTAC (WWIS/WDS)
Charlie Riggs	Auditor, CTAC (AK)
H. Kirschenmann	Auditor, CTAC (NDA)
Priscilla Martinez	Auditor, CTAC (VE)
Mike Noland*	Auditor in Training, CTAC (C6 QA)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
Porf Martinez	Technical Specialist, CTAC (RTR)
Dick Blauvelt	Technical Specialist, CTAC (AK, Waste Certification & Load Management)
Rick Castillo	Technical Specialist, CTAC (VE)
James Oliver	Technical Specialist, CTAC (NDA)
B. J. Verret	Technical Specialist, CTAC (Flam Gas, Container Management, and Shipping Documentation)
Tamara Ackman	Technical Specialist in Training, CTAC (VE)
Greg Knox	Technical Specialist in Training, CTAC (RTR)

* Indicates audit team members working at the Skeen-Whitlock building in Carlsbad, NM.

Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the CCP quality assurance (QA), technical, and transportation activities performed at LANL for characterization, certification, and transportation of contact-handled (CH) Summary Category Group (SCG) S3000 homogeneous solids waste, SGC S4000 soils/gravels, and SCG S5000 debris waste. See the attached "Processes and Equipment to be Evaluated During Audit A-14-19 of the LANL/CCP," for additional details.

Governing Documents/Requirements

Overall program adequacy and effectiveness of the LANL/CCP processes will be based on the current revisions of the following documents.

- DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*
- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- *Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC)*

Programmatic and technical checklists will be developed from current revisions of the following documents.

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-012, *CCP/LANL Interface Document*
- Related NWP/CCP QA and technical implementing procedures

Activities to be Audited:

General

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

C6-1 through C6-4 and General Quality Assurance Program Elements As Applicable

- Personnel Qualification and Training
- Nonconformances
- Records
- Identification and Control of Items
- Documents/Records Control (notebooks/logbooks)
- Software Version Installation
- Measuring and Test Equipment (M&TE)

Technical

- Acceptable Knowledge (AK)
- Generation and Project-Level Data Validation and Verification (V&V)
- Visual Examination (VE)
- Visual Examination Technique (VET), Off-Site Source Recovery Program
- Real-time Radiography (RTR)
- Nondestructive Assay (NDA) and participation in the Performance Demonstration Program (PDP)

- WIPP Waste Information System (WWIS)/Waste Data System (WDS)
- Waste Certification (e.g., Waste Stream Profile Form)

Transportation

- Flammable Gas Analysis
- Shipping Documentation
- Container Management

Schedule of Audit Activities:

A pre-audit conference will be scheduled for Tuesday, July 15, 2014, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday, July 15, and Wednesday July 16, 2014 at 4:00 p.m., and Thursday, July 17, 2014, at 2:00 p.m.

The audit team will brief appropriate LANL and CCP management on Wednesday, July 16, and Thursday, July 17, 2014, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, July 17, 2014, at 3:30 p.m.

All meetings will take place at designated LANL and CBFO locations to be determined by LANL/CCP management.

Prepared by: 
Berry D. Page, Audit Team Leader
CTAC

Date: 6/11/14

Concurrence: 
Michael R. Brown, Director
Office of Quality Assurance

Date: 6/11/14

Processes and Equipment to be Evaluated During Audit A-14-19 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
11MILCC1	Non-Destructive Assay Mobile In-Situ Object Counting System (ISOCS) Large Container Counter (MILCC) Procedure(s) – CCP-TP-076, CCP-TP-077 and CCP-TP-103	Solids (S3000) Soils/Gravel (S5000)	N/A	YES
11RR2	Real-Time Radiography (RTR) Procedures – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography (RTR) Mobile Characterization System [built by VJ Technologies] 55-gallon drums	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11HERTR3	High Energy Real-Time Radiography (HERTR) Procedures CCP-TP-053 and CCP-TP-198 Description – High Energy Real-Time Radiography (RTR) [built by VJ Technologies] 55-gallon drums and SWBs	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11VE1	CH Visual Examination Procedure – CCP-TP-113 Description – CH Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11VE2	Off-Site Source Recovery Program Procedure(s) – CCP-TP-069 and CCP-TP-101 Description – Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)	Debris (S5000)	YES	YES

Processes and Equipment to be Evaluated During Audit A-14-19 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Acceptable Knowledge Procedure – CCP-TP-005 Description – Acceptable Knowledge (AK)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
N/A	Data Verification and Validation Procedure(s) – CCP-TP-001, CCP-TP-002, CCP-TP-003, CCP-TP-103, CCP-TP-162	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11HC1	Nondestructive Assay Procedure – CCP-TP-063, CCP-TP-064, CCP-TP-103 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a transportation container	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES
11HC2	Nondestructive Assay Procedure – CCP-TP-063, CCP-TP-064, CCP-TP-103 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a trailer	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES
11SHC1	Nondestructive Assay Procedure – CCP-TP-059, CCP-TP-064, CCP-TP-103 Description – Super High-Efficiency Neutron Counter mounted in a trailer, SWBs	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES
N/A	WIPP Waste Information System/Waste Data System (WWIS/WDS) Procedure – CCP-TP-030 Description – CH TRU Waste Characterization and WWIS Data Entry	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES

Processes and Equipment to be Evaluated During Audit A-14-19 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Transportation Procedure(s) – CCP-TP-054, CCP-TP-055, CCP-TP-086, DOE/WIPP-02-3184, DOE/WIPP-02-3220, DOE/WIPP-02-3183	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	N/A
N/A	Quality Assurance Program	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES